

SILVERMAN ATTORNEYS
& ASSOCIATES AT LAW

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February 23, 2024

VIA ECF AND FACSIMILE: (914) 390-4179

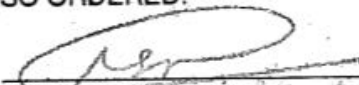
Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Defendants' request for an extension of time is GRANTED.
Pre-motion letter(s) seeking to file summary judgment motion(s) shall be filed by Mar. 29, 2024, and response(s) thereto shall be filed by Apr. 5, 2024. Alternatively, if settlement is reached, the parties shall notify the Court in writing by Mar. 29, 2024. The Clerk of the Court is directed to terminate the motion at ECF No. 79.

**Dated: February 26, 2024
White Plains, NY**

SO ORDERED:

Re: O'Connell v. Town of Bedford Police Department, et al.
Docket No.: 21 CV 00170 (NSR)
Our File No.: 1020. 107


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

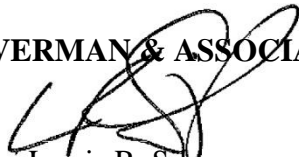
We represent the Defendants in this matter and are writing, with the consent of Plaintiff's Counsel, to respectfully request an additional one-month extension of time to file a summary judgment pre-motion letter from February 29, 2024 to March 29, 2024. This is our third request for this extension, and our second request after the settlement conference with Magistrate Judge Krause on January 5, 2024.

We are making this request because the parties continue to make progress towards a resolution of this matter. Although an agreement was not reached at the settlement conference, the parties have continued to discuss resolution options within a proposed framework and we have made progress on many of the terms of a potential agreement. Some of the terms will request discussion with non-parties, including the plaintiff's union, to ensure that the proposed framework is viable. We are diligently continuing our discussions and all parties believe that the additional time requested will allow the parties to finalize the terms of an agreement.

Based on the above, we respectfully request a one-month extension of time to file a summary judgment pre-motion letter from February 29, 2024 to March 29, 2024. Thank you for your consideration of this matter.

Respectfully yours,

SILVERMAN & ASSOCIATES


Lewis R. Silverman

cc: **Via ECF and Email**

All Counsel of Record

MEMO ENDORSED